

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Jasmina Vajzovic (312) 469-6233

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JEREMIAH J. SCOTT

CASE NUMBER: 20 CR 267-1

FILED**JUN 04 2020****MAGISTRATE JUDGE
GABRIELA FENTES**

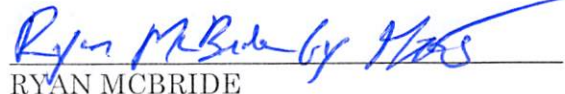
CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about May 31, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

*Code Section*Title 18, United States Code, Section
922(g)(1)*Offense Description*

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a loaded black Sig Sauer P250 semi-automatic handgun with an extended magazine, bearing serial number 57C008234, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm

This criminal complaint is based upon these facts:

X Continued on the attached sheet.


RYAN MCBRIDE

Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives (ATF)*(Telephonically per Rule 4.1)*

Pursuant to Fed. R. Crim. P. 4.1, this complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: June 4, 2020


Judge's signature

City and state: Chicago, Illinois
GABRIEL A. FUENTES, U.S. Magistrate Judge
 Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, RYAN MCBRIDE, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives ("ATF"), and have been so employed for 19 years. My current responsibilities include the investigation of federal firearms offenses, including unlawful possession of firearms or ammunition by convicted felons.

2. This affidavit is submitted in support of a criminal complaint alleging that Jeremiah J. SCOTT has violated Title 18, United States Code, Section 922(g)(1).

3. The facts set forth in this affidavit are based on my personal knowledge, my training and experience, my review of certain reports and video footage, information provided to me by various law enforcement personnel and witnesses, and the training and experience of other law enforcement officers with whom I have spoken.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging SCOTT with unlawful possession of a firearm by a felon, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

I. FACTS SUPPORTING PROBABLE CAUSE

A. SCOTT Unlawfully Possessed a Firearm.

5. On or about May 31, 2020, at approximately 6:00 p.m., Chicago Police Department officers responded to a call of looting and shooting in progress at a liquor store located at or around 5558 W. North Avenue, in Chicago.

6. According to a Chicago Police Department arrest report (the "Arrest Report"), upon arrival at the liquor store, police officers observed that the front door of the liquor store was damaged. Police officers also observed SCOTT inside of the liquor store. Police officers directed SCOTT to exit the store. As SCOTT exited the store, he attempted to flee the scene on foot. According to the Arrest Report, as police officers placed SCOTT in custody, SCOTT attempted to tackle a police officer to the ground by grabbing both of the police officer's legs. Police officers then conducted an emergency takedown and arrested SCOTT for disorderly conduct.

7. On or about June 3, 2020, I received and reviewed police officer body-worn camera footage related to the incident from the Chicago Police Department. According to the Arrest Report and as reflected on police officer body-worn camera footage, during a custodial search of SCOTT on or about May 31, 2020, a police officer recovered a loaded black Sig Sauer P250 semi-automatic handgun with an extended magazine, bearing serial number 57C008234, from SCOTT's groin area. Police officer body-worn camera footage also showed that the door to the liquor store had been damaged and that the interior of the store had been looted.

8. On or about June 4, 2020, I searched law enforcement databases, which indicated that the firearm had been stolen on or about June 11, 2019.

9. On or about June 4, 2020, I compared a photograph from an Illinois driver's license registered to Jeremiah J. Scott to the body-worn camera footage of the incident and to the booking photograph contained in the Arrest Report, and confirmed that the offender involved in the incident was in fact SCOTT. Further, the Illinois driver's license registered to Jeremiah J. Scott has the same address and birth date as the address of the offender listed on the Arrest Report.

B. SCOTT has a Prior Felony Conviction.

10. Based on my review of SCOTT's criminal history, I know that on or about September 6, 2018, in case number 18 CR 0040801, SCOTT was convicted of aggravated unlawful use of a weapon in the Circuit Court of Cook County and sentenced to two years' probation. Based on my training and experience and according to 720 ILCS 5/24-1.6, I know that a conviction of aggravated unlawful use of a weapon in the Circuit Court of Cook County is a Class 4 Felony for which a convicted individual may be sentenced to a term of imprisonment exceeding one year.

11. Based on my training and experience, I know that individuals who are convicted of felonies in the Circuit Court of Cook County, regardless of whether they are sentenced to incarceration, are usually informed of their inability to possess firearms following a felony conviction such as aggravated unlawful use of a weapon.

C. The Firearm SCOTT Unlawfully Possessed Traveled in Interstate or Foreign Commerce.

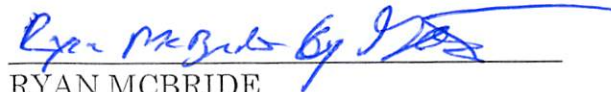
12. I am a certified interstate nexus expert for firearms and ammunition who has previously testified in federal court as an interstate nexus expert. Based on my training and experience, I know that Sig Sauer firearms are manufactured outside the state of Illinois.

13. Therefore, in order for the foregoing firearm to have been recovered in Illinois, it had to have moved in interstate or foreign commerce.

II. CONCLUSION

14. For all the reasons described above, there is probable cause to believe that SCOTT has committed a violation of Title 18, United States Code, Section 922(g)(1) (unlawful possession of a firearm by a felon).

FURTHER AFFIANT SAYETH NOT.



RYAN MCBRIDE

Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives

(Telephonically per Rule 4.1)

SUBSCRIBED AND SWORN to before me on June 4, 2020.



GABRIEL A. FUENTES

United States Magistrate Judge